

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

CARLOS VEGA	:	CIVIL ACTION
	:	
Plaintiff,	:	NO. 19-4039
v.	:	
	:	
CITY OF PHILADELPHIA	:	
Defendant.	:	

PLAINTIFF CARLOS VEGA’S PROPOSED VOIR DIRE QUESTIONS

Plaintiff, Carlos Vega, by and through his undersigned counsel, submits this list of Proposed Voir Dire Questions pursuant to the Court’s Jury Trial Notice:

Parties and Attorneys

1. The plaintiff, who is the person suing in this action, is Carlos Vega. Does anyone know or know of Mr. Vega? If yes, give particulars.
2. Does anyone who knows or knows of Mr. Vega have any particular views or opinions of him?
3. Mr. Vega is suing his former employer, the City of Philadelphia, for age discrimination. Has anyone or someone close to anyone ever been employed by the City of Philadelphia? If yes, give particulars.
4. When Mr. Vega was employed by the City of Philadelphia, he worked in the City’s District Attorney’s Office, as a prosecutor. Has anyone or someone close to any ever worked for or had any interaction with the City of Philadelphia’s District Attorney’s Office? If yes, give particulars.

5. The individual who made the decision to terminate Mr. Vega's employment is the City of Philadelphia's District Attorney, Lawrence Krasner. Does anyone know or know of Mr. Krasner? If yes, give particulars.

6. Does anyone who knows or knows of Mr. Krasner have any particular views or opinions of him?

7. Mr. Vega is represented by the law firms of Sidney L. Gold & Associates and Sidkoff, Pincus & Green, P.C. Does anyone know or know of either of these law firms?

8. The two attorneys at Sidney L. Gold & Associates who are counsel for Mr. Vega are Sidney L. Gold and Traci M. Greenberg. Does anyone know or know of Mr. Gold or Ms. Greenberg?

9. The two attorneys at Sidkoff, Pincus & Green, P.C. who represent Mr. Vega are Robert A. Davitch and Samantha F. Green. Does anyone know or know of Mr. Davitch or Ms. Green?

10. The City of Philadelphia is represented by the law firm of Schnader Harrison Segal & Lewis, LLC. Does anyone know or know of that law firm?

11. The attorneys at the Schnader firm who represent the City of Philadelphia are David Smith, Anne Kane and Samantha Banks. Does anyone know or know of any of these attorneys?

12. The City of Philadelphia is also represented by an attorney, Lisa Swiatek, who works at the City's Law Department. Does anyone know or know of Ms. Swiatek?

Discrimination Claims

13. Mr. Vega is claiming that his employment with the City of Philadelphia was terminated on January 5, 2018, because of his age. Has anyone read, seen or heard anything about this case? If yes, give particulars.

14. Has anyone or someone close to anyone ever thought they experienced discrimination in the workplace? If yes, give particulars.

15. Has anyone or someone close to anyone ever filed a claim or lawsuit for discrimination in the workplace? If yes, give particulars.

16. Has anyone witnessed what they thought was discrimination against someone in the workplace? If yes, give particulars.

17. Has anyone or someone close to anyone ever been sued for employment discrimination or had a claim brought against them or someone they worked for discrimination in the workplace? If yes, give particulars.

18. Has anyone or someone close to anyone ever been accused of engaging in discrimination in the workplace, even if no claim or lawsuit was filed? If yes, give particulars.

19. Does anyone believe that there is anything wrong or improper about accusing someone of discrimination in the workplace? If yes, give particulars.

20. Does anyone that believe there is anything wrong or improper about filing a claim or lawsuit for discrimination in the workplace? If yes, give particulars.

21. Does anyone have any positive, negative, favorable or unfavorable views of people who bring claims or file lawsuits for discrimination in the workplace? If yes, give particulars.

Specific Employment History

22. Has anyone or someone close to anyone ever worked for a city, state, municipality, township, or government employer other than the City of Philadelphia? If yes, give particulars.

23. Has anyone or someone close to anyone ever been an owner of a company? If yes, give particulars.

24. For those of you who own or have owned a company, did you have responsibility for hiring and firing employees? If yes, give particulars.

25. Has anyone ever terminated an employee or recommended that an employee's employment be terminated? If yes, give particulars.

26. Has anyone or someone close to anyone ever had managerial responsibilities for a company? If so, did those responsibilities include hiring and firing employees, or recommending that employees be hired or terminated? If yes, give particulars.

Litigation Experience

27. Has anyone or someone close to anyone ever filed a lawsuit for any reason other than employment discrimination? If yes, give particulars.

28. Has anyone or someone close to anyone ever been sued in a legal case for any reason other than employment discrimination? If yes, give particulars.

29. Has anyone ever been a witness or testified in a lawsuit? If yes, give particulars.

30. Has anyone ever served as a juror? If yes, give particulars.

31. Is anyone or someone close to anyone a lawyer or licensed to practice law? If yes, give particulars.

32. Has anyone or someone close to anyone ever worked for a lawyer or a law firm? If yes, give particulars.

Witnesses

33. Does anyone know or know of any of the following persons, who may be called in this case as witnesses:

Brian Zarallo
Jennifer Selber
John Delaney, Jr.
Ann Ponterio
Edward McCann, Jr.
Charles Gallagher, III
Andrew Verzilli
Victoria Power
Olivia Ann Cacomo
Kirk Handrich
Rachel Mitchell
Michael Giampietro
Jack McMahon
Anthony Voci
Jody Dodd
Dustin Slaughter
Cecelia Madden
Shamika Taliferro

Damages

34. Does anyone have a problem with the concept that someone who has been discriminated against should be fairly compensated in money damages for the discrimination? If yes, give particulars.

35. Does anyone believe that there should be a limitation or cap on monetary damages awarded against a municipality like the City of Philadelphia or a private company? If yes, give particulars.

36. Does anyone believe that awarding a large amount of monetary damages for discrimination would encourage more lawsuits? If yes, give particulars.

37. Is there anyone who, for whatever reason, would be reluctant to award full monetary damages to Mr. Vega, to the extent allowed by the law, if you find that he was discriminated against? If yes, give particulars.

38. Does anyone believe that in lawsuits, people are too often awarded too much or too little in monetary damages? If yes, give particulars.

Follow the Law

39. Is there anyone who would hesitate to follow the law in this case in accordance with instructions given by the judge, even if you disagree with it? If yes, give particulars.

/s/ Robert A. Davitch

Robert A. Davitch, Esq.
Samantha F. Green, Esq.
Sidkoff, Pincus & Green, P.C.
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Counsel for Plaintiff Carlos Vega

/s/ Sidney L. Gold

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Traci M. Greenberg, Esq.
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Counsel for Plaintiff Carlos Vega

Date: October 24, 2022

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EASTERN DISTRICT OF PENNSYLVANIA

<u>CARLOS VEGA</u>	:	CIVIL ACTION
	:	
Plaintiff,	:	NO. 19-4039
v.	:	
	:	JURY TRIAL DEMANDED
CITY OF PHILADELPHIA	:	
Defendant.	:	

CERTIFICATE OF SERVICE

I, Robert A. Davitch, hereby certify that *Plaintiff Carlos Vega's Proposed Voir-Dire Questions* has been served via electronic service of the Court, and is available for viewing and downloading on the Court's ECF system.

/s/ Robert A. Davitch
ROBERT A. DAVITCH
Attorney for Plaintiff Carlos Vega

Date: October 24, 2022